

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER
LEO-GUERRA, MICHAEL MAERLENDER,
BRANDON PIYEVSKY, BENJAMIN SHUMATE,
BRITTANY TATIANA WEAVER, and
CAMERON WILLIAMS, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA
INSTITUTE OF TECHNOLOGY, UNIVERSITY
OF CHICAGO, THE TRUSTEES OF COLUMBIA
UNIVERSITY IN THE CITY OF NEW YORK,
CORNELL UNIVERSITY, TRUSTEES OF
DARTMOUTH COLLEGE, DUKE UNIVERSITY,
EMORY UNIVERSITY, GEORGETOWN
UNIVERSITY, THE JOHNS HOPKINS
UNIVERSITY, MASSACHUSETTS INSTITUTE
OF TECHNOLOGY, NORTHWESTERN
UNIVERSITY, UNIVERSITY OF NOTRE DAME
DU LAC, THE TRUSTEES OF THE
UNIVERSITY OF PENNSYLVANIA, WILLIAM
MARSH RICE UNIVERSITY, VANDERBILT
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

Hon. Matthew F. Kennelly

**PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF CERTAIN DONOR
REPORTS AND TO COMPEL NORTHWESTERN TO PRODUCE PRESIDENT
MORTON SCHAPIRO FOR TWO ADDITIONAL HOURS OF DEPOSITION**

On the grounds set forth in the supporting memorandum submitted on this same date and in the exhibits submitted herewith, Plaintiffs respectfully move the Court to enter an Order (1) directing Northwestern University to produce donor reports for the first 100 donor-linked applicants on each President's List during the class period and (2) requiring Northwestern to produce Morton Schapiro for an additional two hours of deposition.

Dated: September 25, 2023

By: /s/ Robert D. Gilbert

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Respectfully Submitted,

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